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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

9 THE UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 LEONARDO A. OLIVEIRA SANTOS,

13 Defendant.

Case no.: 2:17-CR-00001-JAD-CWH

STIPULATION TO CONTINUE

SENTENCING AND DISPOSITION

14 IT IS HEREBY STIPULATED AND AGREED by and between Defendant,
15 LEONARDO A. OLIVEIRA SANTOS, by and through his counsel, TODD M. LEVENTHAL,
16 ESQ., and the United States of America, by its counsel, JOHN P. BURNS, Assistant U.S.
17 Attorney, that the Sentencing and disposition in the above-captioned matter currently set for
18 Monday, June 11, 2018 be re-set for 60 days out at the courts convenience.

19 This Stipulation is entered into for the following reasons

- 20 1. There are pending issues that remain which are vital to the Sentencing and Disposition of
21 Mr. Oliveira-Santos.
- 22 2. Mr. Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he
23 has no objection to continue the hearing.
- 24 3. Mr. Oliveira- Santos is currently in custody and agrees with this request.

1 4. Additionally, denial of this request for a continuance could result in a miscarriage of
2 justice.
3

4 DATED this 30th day of May, 2018
5

6
7 /s/ Todd M. Leventhal
TODD M. LEVENTHAL, ESQ.
8 Counsel for Leonardo A. Oliveira Santos
9

/s/ John P. Burns
JOHN PATRICK BURNS
Assistant U.S. Attorney

10 Submitted By: LEVENTHAL AND ASSOCIATES, PLLC.
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12

13 By: /s/ Todd M. Leventhal
TODD M. LEVENTHAL, ESQ.
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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

9 THE UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 LEONARDO A. OLIVEIRA SANTOS,

13 Defendant.

Case no.: 2:17-CR-00001-JAD-CWH

STIPULATION TO CONTINUE

SENTENCING AND DISPOSITION

14 **FINDINGS OF FACT**

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16 Based on the Stipulation of counsel, and good cause appearing, the Court finds that:

- 17 1. There are pending issues that remain which are vital to the Sentencing and Disposition of
18 Mr. Oliveira-Santos.
- 19 2. Mr. Leventhal has spoken to JOHN P. BURNS, Assistant United States Attorney, and he
20 has no objection to continue the hearing.
- 21 3. Mr. Oliveira- Santos is currently in custody and agrees with this request.
- 22 4. Additionally, denial of this request for a continuance could result in a miscarriage of
23 justice.
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CONCLUSIONS OF LAW

1. For all the above-stated reasons, the ends of justice would best be served by granting the requested continuance of the current Sentencing date for at least 120 days at a time convenient for the court.

ORDER

Accordingly, IT IS SO ORDERED that the current **Sentencing Hearing** is vacated and the same is continued and reset for August 13, 2018, at the hour of 11:00 a.m.

DATED this 31st day of May, 2018.



JENNIFER A. DORSEY
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 30TH day of MAY, 2018 a true and correct copy of the, **STIPULATION AND ORDER TO CONTINUE SENTENCING AND DISPOSITION** was filed through the CM/ECF filing system and was electronically served to the following registered addresses on file for this instant case :

John Patrick Burns : John.P.Burns@usdoj.gov, USANV.team2@usdoj.gov,
veronica.criste@usdoj.gov

/s/ Todd M. Leventhal
An Employee of TODD M. LEVENTHAL,ESQ.
LEVENTHAL & ASSOCIATES, PLLC.